

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	
)	Case No. 15-37655
Jerome Gendron,)	
)	Judge Donald Cassling
Debtor.)	
)	Chapter 13

NOTICE OF MOTION

TO: ALL INTERESTED PARTIES

PLEASE TAKE NOTICE that on January 8, 2016 at 9:30am I shall appear before the Honorable Donald Cassling at the Kane County Courthouse, 100 South Third Street, Room #240, Geneva, IL 60134 and present the attached Motion and you may appear if you so choose. The Bankruptcy Court will hold a hearing to consider a request by Debtor's Counsel for payment of legal fees in the amount of \$4,000, plus expenses of \$383.00 (\$310 filing fee and \$73 credit report), if there are no objections the Court may confirm the plan and allow fees requested by Debtor's counsel to be paid through the plan.

Respectfully submitted

/s/ Rusty A. Payton
Attorneys for the Plaintiff:
Rusty A. Payton (#06201771)
PaytonDann
161 North Clark Street, Suite 4700
Chicago, Illinois 60601
email: payton@paytondann.com
Ph. (312) 702-1000
Fx. (312) 702-1000

CERTIFICATE OF SERVICE

I, the undersigned, an attorney, hereby state that pursuant to the Administrative Procedures for the Case Management/Electronic Case Filing System, I caused a copy of the foregoing **NOTICE OF MOTION** and **APPLICATION FOR COMPENSATION** to be served on all persons set forth on the attached Service List identified as Registrants through the Court's Electronic Notice for Registrants, and, as to all other persons on the attached Service List by mailing a copy of the pleading in an envelope properly addressed and with postage fully prepaid and by depositing same in the U.S. Mail, Chicago, Illinois, on **November 6, 2015**.

By: /s/ Rusty A. Payton

SERVICE LIST

Registrants Served Through the Court's Electronic Notice for Registrants:	Parties and Creditors Served by U.S. Mail:
Patrick Layng, United States Trustee 219 via email USTPRegion11.ES.ECF@usdoj.gov Glenn Stearns via email mcguckin_m@lisle13.com All Registrants through the Court's Electronic Notice for Registrants	None

Document Page 3 of 4
UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF ILLINOIS

Eastern Division

In Re:)	BK No.: 15-37655
Jerome Gendron)	(Jointly Administered)
)	Chapter: 13
)	Honorable Donald R. Cassling
)	Kane
Debtor(s))	

**ATTORNEY'S APPLICATION FOR CHAPTER 13 COMPENSATION UNDER
THE COURT-APPROVED RETENTION AGREEMENT
(Use for cases filed on or after April 20, 2015)**

The undersigned attorney seeks compensation pursuant to 11 U.S.C. § 330(a)(4)(B) and the **Court-Approved Retention Agreement** executed by the debtor(s) and the attorney, for representing the interests of the debtor(s) in this case.

Use of Court-Approved Retention Agreement:

The attorney and the debtor(s) have entered into the Court-Approved Retention Agreement.

Attorney Certification:

The attorney hereby certifies that:

1. All disclosures required by General Order No. 11-2 have been made.
2. The attorney and the debtor(s) have either:
 - (i) not entered into any other agreements that provide for the attorney to receive:
 - a. any kind of compensation, reimbursement, or other payment, or
 - b. any form of, or security for, compensation, reimbursement, or other payment that varies from the Court-Approved Retention Agreement; or
 - (ii) have specifically discussed and understand that:
 - a. the Bankruptcy Code may require a debtor's attorney to provide the debtor with certain documents and agreements at the start of the representation;
 - b. the terms of the Court-Approved Retention Agreement take the place of any conflicting provision in an earlier agreement;
 - c. the Court-Approved Retention Agreement cannot be modified in any way by other agreements; and
 - d. any provision of another agreement between the debtor and the attorney that conflicts with the Court-Approved Retention Agreement is void.

Compensation sought for services in this case pursuant to the Court-Approved Retention Agreement:

\$ 4,000.00 flat fee for services through case closing

Reimbursement sought for expenses in this case:

\$ 335.00 for filing fee paid by the attorney with the attorney's funds

\$ 73.00 for other expenses incurred in connection with the case and paid by the attorney with the attorney's funds (itemization must be attached)

\$ 408.00 Total reimbursement requested for expenses.

Funds previously paid to the attorney by or on behalf of the debtor(s) in the year before filing this case and not reflected in or related to the Court-Approved Retention Agreement:

☐ None

A total of \$ 7,500.00

Date of Application: 11/04/15 _____

Attorney Signature /s/ Rusty A. Payton _____